

EXHIBIT 4

1 IN THE UNITED STATES DISTRICT COURT
2 FOR THE SOUTHERN DISTRICT OF IOWA
3 CENTRAL DIVISION

4 IOWA PRIMATE LEARNING)
5 SANCTUARY d/b/a GREAT)
6 APE TRUST and APE) No.
7 COGNITION AND) 4:10-cv-00052-JEG-RAW
8 COMMUNICATION INSTITUTE,))

9 Plaintiffs,)

10 vs.)

11 ZOOLOGICAL FOUNDATION) DEPOSITION OF
12 OF GEORGIA, INC., d/b/a) JARED TAGLIALATELA,
13 ZOO ATLANTA, DEMOCRATIC) Ph.D.
14 REPUBLIC OF CONGO,)
15 JAPAN MONKEY CENTRE)
16 INSTITUTE AND MUSEUM OF)
17 PRIMATOLOGY, SUE)
18 SAVAGE-RUMBAUGH, Ph.D.,)

19 Defendants,)

20 and)

21 BONOBHO HOPE INITIATIVE,)
22 INC.,)

23 Intervenor)
24 Defendant.)
25 -----)

CONFIDENTIAL PURSUANT TO PROTECTIVE ORDER

26 THE DEPOSITION OF JARED
27 TAGLIALATELA, Ph.D., taken before Chris A.
28 Quinlin, Certified Shorthand Reporter and Notary
29 Public of the State of Iowa, commencing at
30 9:30 a.m., January 23, 2015, at 801 Grand
31 Avenue, Suite 3300, Des Moines, Iowa.

32 Reported by: Chris A. Quinlin, C.S.R.

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Also present: SUE SAVAGE-RUMBAUGH, Ph.D.

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Mr. Zifchak 4

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JARED TAGLIALATELA, Ph.D.,

called as a witness, having been first duly
sworn, testified as follows:

DIRECT EXAMINATIONBY MR. ZIFCHAK:**Q.** Morning, Jared.**A.** Morning.

Q. Would you please state your name and
business address for the record?

**A. Jared Taglialatela. My business
address -- I have a couple of them, but my home
institution is Kennesaw State University. It's
1000 Chastain Road, Kennesaw, Georgia 30144.**

Q. Just a few preliminaries. Have you
ever been deposed before, given testimony in a
legal action?

A. No.

Q. If I ask a question that you don't
understand, please say so, and I'll try to
explain it or rephrase it.

A. Okay.

Q. Your counsel may state objections to
certain of my questions, principally if they are
stated ineloquently, but unless he directs you
not to answer, you should answer the question.

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A. Um-hum.

Q. Are you taking any medication or
anything that would impact your ability to
testify today?

A. No.

Q. And again, these are preliminary
questions. How did you prepare for today's
deposition?

**A. I -- I guess I've met with counsel and
looked over some previous correspondences.**

Q. In the last week or so have you seen
any specific document requests that we provided
to your counsel?

A. I'm trying to recall. Yes.

Q. Would you please recap your educational
background?

**A. Sure. I have an undergraduate degree
from the University of Virginia which was
awarded in 1997. It's in biology. I have a
Ph.D. in neurobiology and behavior from Georgia
State University. It was awarded in 2004. I
have an NIH postdoctoral fellowship that was
from 2004 to 2008, and I have -- was a professor
since that time in 2008, two different
universities, Clayton State University from 2008**

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1 **question to answer, Bill, because when I was**
 2 **appointed, it was my understanding that Doctor**
 3 **Rumbaugh wasn't at the lab.**

4 **Q.** Meaning of her own volition she was not
 5 at the lab? She was not active at the lab? Is
 6 that what you mean?

7 **A.** **She was not active at the lab, it was**
 8 **my understanding.**

9 **Q.** Sitting here today --

10 **A.** **Yeah.**

11 **Q.** -- is it correct that Doctor Rumbaugh
 12 is not permitted access to the lab?

13 **A.** **Yes.**

14 **Q.** And for how long has that, I'll call
 15 it, embargo been in place?

16 **A.** **I don't know, but let's say since**
 17 **the --**

18 **Q.** Since your appointment?

19 **A.** **Right.**

20 **Q.** And you agree with or you condone that
 21 ban?

22 **A.** **At this point in time.**

23 **Q.** And can you explain why that is?

24 **A.** **Yes.**

25 **Q.** All right. Please do.

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1 **A.** **I think Doctor Rumbaugh poses a risk, a**
 2 **health and safety risk to the bonobos and to the**
 3 **people that work around her.**

4 **Also, Doctor Rumbaugh told me in**
 5 **the fall of 2013, and I subsequently educated**
 6 **myself and found her remarks at that time to be**
 7 **accurate, that her involvement with the**
 8 **organization would be detrimental to our ability**
 9 **to fundraise or rebuild a -- you know, a**
 10 **reputation -- a credible reputation and that if**
 11 **my -- I'm trying to do what's best for the**
 12 **bonobos, so we would have her continue to not be**
 13 **involved so as not to compromise those things.**

14 **MR. ZIFCHAK:** **Could you read back**
 15 **the last answer, please?**

16 **(Requested portion of the record**
 17 **was read.)**

18 **Q.** What is the basis for your statement
 19 that Doctor Rumbaugh would pose a health and
 20 safety risk to the bonobos since she hasn't had
 21 access to the bonobos for over a year?

22 **A.** **I'm basing that on historical things**
 23 **that have occurred.**

24 **Q.** Like what?

25 **A.** **How far do you want me to go back?**

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1 **Q.** Go back as far as you want.

2 **A.** **I'll just kind of cherry-pick a couple**
 3 **things that come off the top of my head.**

4 **Due to Doctor Rumbaugh's**
 5 **negligence, slash, breaking of protocol, Kanzi**
 6 **escaped and maimed Bill Fields, landing him in**
 7 **the hospital for an extended period of time.**
 8 **And I think he had to endure multiple surgeries.**

9 **Q.** When was that?

10 **A.** **I don't remember the exact year. I**
 11 **would say it's on or about 2001, maybe.**

12 **Q.** Okay. Anything else?

13 **A.** **I am aware that Doctor -- under Doctor**
 14 **Rumbaugh's care Nyota, when he was young, was**
 15 **left unattended with two pitbull dogs in**
 16 **Atlanta. Those dogs and Nyota subsequently went**
 17 **into a neighborhood, where a neighbor notified**
 18 **us, I believe, and that was fortunate. And**
 19 **Nyota had to be retrieved, as were the dogs.**

20 **Doctor Rumbaugh then proceeded to**
 21 **bring the dogs in with the bonobos and**
 22 **instructed Kanzi and Panbanisha to physically**
 23 **punish them.**

24 **THE COURT REPORTER:** **I'm sorry,**
 25 **say it again.**

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1 **A.** **Doctor Rumbaugh proceeded to bring**
 2 **those dogs in and place them inside the**
 3 **enclosure with Kanzi and Panbanisha, adult apes,**
 4 **and it was -- and instructed Kanzi and**
 5 **Panbanisha to physically punish them.**

6 **Q.** When did that occur?

7 **A.** **I don't remember exactly. On or around**
 8 **that 2001 time period.**

9 **Q.** All right. Anything else?

10 **A.** **I'm aware Doctor Rumbaugh brought Teco,**
 11 **who was a young baby at the time, to a public**
 12 **event, exposing him to a number of different,**
 13 **you know, pathogens that potentially could be**
 14 **involved in public -- and I'm not 100 percent**
 15 **sure, but I actually think it violated USDA law**
 16 **transporting him in that way. I'm aware of --**
 17 **So that was a separate incident. Separate**
 18 **incident.**

19 **Doctor Rumbaugh exposed Teco to**
 20 **numerous visitors. This has been reported to me**
 21 **over and over again, exposing -- that are**
 22 **neither providing health documentation or**
 23 **wearing appropriate protective equipment to make**
 24 **sure that they are not transmitting diseases to**
 25 **young Teco.**

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1 Q. Anything else?

2 A. I'm aware of a number of incidences in
3 which Doctor Rumbaugh allowed baby Teco to get
4 into various over-the-counter medications and --
5 and was -- had to be treated a number of times.
6 And I believe even one of them included a burn
7 from coffee.

8 Q. Anything else?

9 A. I'm aware of an incident that occurred
10 with Nyota and Kanzi. There may have, in fact,
11 been multiple incidences, Doctor Rumbaugh has
12 not been clear to me on that in e-mail, in which
13 it resulted in Nyota fracturing his maxilla,
14 which is the upper part of the jaw.

15 Q. When did that occur? Do you know?

16 A. I believe that occurred sometime in
17 2010.

18 Q. What about the coffee burning episode?

19 A. I'm not -- I'd have to check the
20 record. I don't recall. It's since Teco has
21 been alive.

22 Q. Anything else?

23 A. I'm aware of a -- I believe a fight
24 between Maisha and Nyota in which they sustained
25 an injury. And it's my understanding that for
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1 whatever reason protocols dictated that they not
2 be placed together at the time.

3 Q. When was that?

4 A. I think that was around the -- sometime
5 in -- I would -- I don't recall exactly. I'd
6 have to check. In Iowa.

7 Q. It was in Iowa?

8 A. Um-hum.

9 Q. Anything else?

10 A. I'm aware of an incident in which
11 Doctor Rumbaugh placed a small dog with the
12 entire group of bonobos and that the bonobos
13 harmed the dog to the point where it had to
14 basically be given surgery -- I think it was
15 multiple surgeries. It was practically dead.
16 It was removed by staff with the help of one of
17 the bonobos.

18 Q. When was that?

19 A. I think -- I'm not sure. I can't say
20 for certain.

21 Do you want to continue?

22 Q. Sure.

23 A. I'm aware of -- Well, never mind. I'm
24 not going to say that one.

25 Not to jump out of order, but
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1 in -- sometime, I believe, in 1999 Doctor

2 Rumbaugh placed a new graduate student in close
3 proximity of the cage with -- with -- this
4 person was basically brand new, and Doctor
5 Rumbaugh instructed her to sit with her back up
6 against the cage with the bonobos inside. It's
7 extremely risky behavior that could have
8 resulted in an injury.

9 Q. Anything else?

10 A. Again in Atlanta Doctor Rumbaugh put a
11 research technician in the position where she
12 was bitten, I think, twice on the leg.

13 Q. What was the name of the technician?

14 A. Mary -- Mary Minahan at the time.

15 M-I-N-A-H-A-N.

16 Q. Anything else?

17 A. I'm thinking. I don't want to repeat
18 myself.

19 At some point when Doctor
20 Rumbaugh was -- At some point since 2010 Nyota's
21 canines have been surgically removed as far as
22 we know or have been removed by some other
23 mechanism. I conclude that they've been
24 surgically removed because I've talked with a
25 number of primate and great ape veterinarians
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1 who have never heard of an instance where both
2 canines would be gone. We will verify that with
3 radiographs. Okay? Removal of canines of a
4 great ape is cruel and inhumane.

5 Q. Anything else?

6 A. I'm just -- I'm just thinking at this
7 point. There were a number of times when I was
8 in graduate school that I came into the lab to
9 work and found locks off the cages, which would
10 be locks that -- that means the primary
11 mechanism by which to keep the apes inside the
12 enclosure and me on the outside.

13 Q. Anything else?

14 A. I think at this point I probably have
15 exhausted my, you know, short-term memory for
16 doing things like this. I'd have to check my
17 notes. I believe there are additional
18 incidences.

19 Q. Do you have notes that you've collected
20 on all of these incidents?

21 A. Not in a systematic way, no.

22 Q. But you do have notes?

23 A. I think I have e-mail correspondences
24 that may jog my memory.

25 Q. How many of the incidents that you've
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